

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

GAWKER MEDIA LLC, *et. al.*,

Debtors.

)
) Chapter 11
)

) Case No. 16-11700 (SMB)
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**LIMITED OBJECTIONS OF WRITERS GUILD OF AMERICA, EAST, TO NOTICE OF
(A) PROPOSED ASSUMPTION AND ASSIGNMENT OF EXECUTORY CONTRACTS
AND UNEXPIRED LEASES IN CONNECTION WITH SALE AND (B) ASSOCIATED
CURE COSTS**

1. The Writers Guild of America, East, AFL-CIO (the “WGAE” or the “Union”) submits these Limited Objections to Notice of (a) Proposed Assumption and Assignment of Executory Contracts and Unexpired Leases in Connection with Sale and (b) Associated Cure Costs (the “Assumption Motion”).

2. The WGAE represents thousands of writers in motion pictures, television, cable, digital media, and broadcast news. They craft stories that inform and entertain millions of Americans, working for broadcast and cable networks, feature film studios, and digital news companies, writing dramas, comedies, documentaries, and news.

3. In 2015, the editorial employees at Gawker Media voted overwhelmingly to be represented by the WGAE. This powerful outpouring of union support was the start of a broader digital media organizing campaign during which editorial employees at VICE Media, ThinkProgress, Salon.com, and The Huffington Post also joined with the WGAE for purposes of collective bargaining.

4. The Gawker employees were actively engaged in the process of negotiating a first collective bargaining agreement. Employees selected a bargaining committee of about 18 co-workers who shaped the union's bargaining proposals, participated in every bargaining session with management, and communicated continuously with all of the union-represented employees as negotiations progressed. The entire unionized workforce was informed, engaged, and mobilized throughout the bargaining process.

5. After many months of negotiations, the union and the company reached agreement on a complete collective bargaining agreement (the "WGAE CBA" or the "CBA"). In February 2016 that agreement was ratified by the Gawker employees with a nearly 98% "yes" vote.

6. Gawker's editorial employees remain engaged in the union process, meeting regularly with management in various committees. There is an active WGAE shop committee comprised of rank and file employees who discuss conditions at the company and monitor current developments (including, of course, this Chapter 11 proceeding).

7. There is strong, unequivocal support in this bargaining unit for the WGAE CBA. The editorial employees – whose work is essential to the viability of all of the Gawker websites – are eager to continue to use their skills and experience to craft stories that Gawker's readers and viewers enjoy. They are not at all interested in renegotiating terms and conditions of employment that they so recently finalized after a lengthy process of organizing and bargaining.

8. The shop committee, together with the WGAE more broadly, recently issued a statement which is attached to these Limited Objections as Exhibit A. As the statement makes clear, the union and its members believe that it is in the interest of Debtors and of any possible

purchaser to assume and assign the collective bargaining agreement so that the employees can remain focused on the work at hand, without the disruption and uncertainty that would be created if the CBA were rejected. The Chapter 11 filing, of course, had nothing to do with labor costs or “work rules” or anything similar. This is not the time to try to reopen the CBA. The workforce is productive and committed to creating the best possible material for Gawker’s readers and viewers. The WGAE and the employees in the Gawker bargaining unit have a very positive relationship with Gawker management and we look forward to continuing that productive relationship with whichever entity purchases the company’s assets.

9. The Assumption Motion does not, of course, indicate which executory contracts might be assumed and assigned by a prospective purchaser (although we believe assumption and assignment of the WGAE CBA is essential to a successful reorganization). It does not appear to ascribe any Cure Amount in connection with the WGAE CBA is rejected. It is premature to conclude that damages would not arise between now and either assumption or rejection of the WGAE CBA.

Dated: August 9, 2016
New York, New York

WRITERS GUILD OF AMERICA EAST, INC

BY: */s/ Ann Burdick*

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Exhibit A

SUBJECT: Gawker Urges Auction Bidders To Respect Union Contract



FOR IMMEDIATE RELEASE

Gawker Employees Urge Auction Bidders To Respect Union Contract

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New York, NY (August 8, 2016) – The editorial employees of Gawker Media voted overwhelmingly last year to join the Writers Guild of America, East (WGAE). With strong member involvement, the union negotiated a contract that was ratified by a vote of 88 to 2. Gawker recently filed a Chapter 11 bankruptcy petition and plans to sell its assets as a going concern. Bidders are being encouraged to respect the union contract. The union's leaders at Gawker urge them to do so in the following statement:

“In March, after many months of negotiations, Gawker Media's editorial employees approved our first union contract. This contract, the product of much painstaking work, is the framework under which we have all agreed to work for a period of three years. We have no desire or inclination to work under terms other than our existing union contract. We wish to state as clearly as possible that it would be a profound mistake for any buyer to try to alter or renegotiate the terms of our contract in any way. We know that this message has been communicated to all potential buyers, and we trust that they will take it to heart in order to maintain a happy, productive, and functional workplace.

We look forward to building a constructive relationship of mutual respect with the new owners. This can only happen under the terms of our union contract.”

ABOUT WRITERS GUILD OF AMERICA, EAST

The Writers Guild of America, East, AFL-CIO (WGAE) is a labor union representing writers in motion pictures, television, cable, digital media and broadcast news. The Guild negotiates and administers contracts that protect the creative and economic rights of its members; conducts programs, seminars and events on issues of interest to writers; and presents writers' views to various bodies of government. For more information on the Writers Guild of America, East, visit wgaeast.org.

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